

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION

POURIA POURHOSSEINHENDABAD,  
*Petitioner,*

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States, *et al.*

*Respondents.*

Civil Action No. 1:25-cv-00987

Judge Dee D. Drell

Magistrate Judge Joseph H.L. Perez-  
Montes

**PETITIONER'S MOTION FOR TEMPORARY RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION**

Petitioner Pouria Pourhosseinhabad ("Petitioner" or "Pouria") respectfully requests, in accordance with Local Rule 65.1, that this Honorable Court grant a temporary restraining order ("TRO") and preliminary injunction against Respondents because, as demonstrated in the attached memorandum of law and other supporting documents, his immigration detention is unlawful. Petitioner therefore requests an order restraining Respondents from further detaining him. On July 11, 2025, counsel for Petitioner contacted the United States Attorney's Office for the Western District of Louisiana, who have indicated that they will be primary counsel for Respondents and that Respondents oppose this motion. Undersigned counsel will serve a courtesy copy of this motion, supporting documents and proposed order via email to counsel for Respondents while formal service of process is pending, so that they are on notice of all filings and evidence, and will not be prejudiced while formal service is pending.

Dated: July 11, 2025

Respectfully submitted,

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/s/ Charles Andrew Perry  
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*Attorneys for Plaintiff*  
*\* Pro hac vice applications forthcoming*

**CERTIFICATE OF SERVICE PURSUANT TO LOCAL RULE 65.1**

I hereby certify on July 11, 2025, I electronically filed the foregoing document, supporting documents, and proposed order with the Clerk of the Court using the CM/ECF system and that a courtesy copy of this Motion and all attachments thereto and the related Petition in this matter will be sent today, July 11, 2025, to counsel for Respondents, the United States Attorney's Office for the Western District of Louisiana, at the following email addresses:

Shannon.Brown@usdoj.gov  
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Respectfully submitted,

*/s/ Charles Andrew Perry*  
*/s/ Nora Ahmed*  
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